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Attorneys for Plaintiff
TYISHA DANZY

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

TYISHA DANZY, individually and on behalf of
all others similarly situated,

Plaintiffs,

vs.

MDG USA Inc., a Delaware corporation; and
DOES 1-50, inclusive,

Defendants.

Case No. 4:22-CV-01923-WHO

**STIPULATED REQUEST FOR ORDER
CONTINUING HEARING DATE AND
CASE MANAGEMENT CONFERENCE;
ORDER**

Complaint Filed: February 23, 2022
Trial Date: TBD

Case No. 3:22-cv-01923-WHO

**STIPULATED REQUEST FOR ORDER CONTINUING
HEARING DATE AND CASE MANAGEMENT CONFERENCE**

Pursuant to Local Rules 6-1, 6-2, 7-7(b), and 7-12, plaintiff Tyisha Danzy and defendant MDG USA Inc., by and through their undersigned counsel, agree and stipulate as follows:

WHEREAS, on March 25, 2022, MDG removed this case from California state court.

WHEREAS, on April 13, 2022, the Court entered a case management conference order (Dkt. No. 22) scheduling the initial case management conference in this case for June 28, 2022, at 2:00 p.m. before the Honorable William H. Orrick via Zoom Webinar.

WHEREAS, on April 22, 2022, Plaintiff filed a Motion to Remand.

WHEREAS, on May 6, 2022, MDG filed a Motion for Judgment on the Pleadings.

WHEREAS, the Court has scheduled a hearing on the pending motions for June 15, 2022, at 2:00 p.m.

WHEREAS, the parties have recently engaged in discussions regarding potential resolution of this matter.

WHEREAS, the parties agree that a brief continuance of the case management conference and the hearing on the pending motions would facilitate further discussion by the parties. The parties further believe that it would save judicial resources to conduct the motion hearing and the case management conference on the same date.

WHEREAS, the parties agree to stipulate to continuing the hearing on the pending motions and the case management conference to **July 20, 2022 at 2:00 p.m.**, or such later date and time at the Court's convenience.

WHEREAS, the parties have not previously stipulated to or requested any extensions of time with respect to the initial Case Management Conference or the hearing on Plaintiff's Motion to Remand and MDG's Motion for Judgment on the Pleadings.

IT IS HEREBY STIPULATED that the initial Case Management Conference and the hearing on plaintiff's motion to remand and MDG's motion for judgment on the pleadings be re-set to **July 20, 2022 at 2:00 p.m.**, , or such later date and time at the Court's convenience.

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K&L GATES LLP

Dated: June 8, 2022

By: /s/ Jonathan Theonugraha

ANDREW C. GLASS
GREGORY N. BLASE
JEREMY M. McLAUGHLIN
JONATHAN THEONUGRAHA

Attorneys for Defendant
MDG USA INC.

Dated: June 8, 2022

DOSTART HANNINK & COVENEY LLP

By: /s/ Zach P. Dostart

JAMES T. HANNINK
ZACH P. DOSTART

Attorneys for Plaintiff
TYISHA DANZY

FILER'S SIGNATURE ATTESTATION PURSUANT TO CIVIL LOCAL RULE

I, Jonathan Theonugraha, attest that concurrence in the filing of this document has been obtained from the other signatories. All signatories listed, on whose behalf this filing is submitted, concur in its content and authorize its filing.

K&L GATES LLP

Dated: June 8, 2022

By: /s/ Jonathan Theonugraha

JONATHAN THEONUGRAHA

ORDER


Pursuant to the foregoing stipulation, and for good cause showing, **IT IS HEREBY ORDERED** that:

1.) The hearing on plaintiff's motion to remand and MDG's motion for judgment on the pleadings currently scheduled for June 15, 2022 at 2:00 p.m. is vacated and re-set to **July 20, 2022 at 2:00 p.m.**

2.) The initial case management conference currently scheduled for June 28, 2022 at 2:00 p.m. is vacated and re-set to **July 20, 2022 at 2:00 p.m.**

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: June 13, 2022



HON. WILLIAM H. ORRICK
United States District Judge